

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both individually
and as Legal Guardian of Shane Allen
Loveland, and JACOB SUMMERS,

Case No. 8:18CV127

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

**DECLARATION OF EDWARD S. BOTT,
JR. IN SUPPORT OF THE GOODYEAR
TIRE & RUBBER COMPANY'S BRIEF IN
OPPOSITION TO NON-PARTY
KEARNEY TOWING & REPAIR
CENTER, INC.'S RULE 59 MOTION TO
ALTER OR AMEND; RULE 60 MOTION
FOR RELIEF**

I, Edward S. Bott, Jr., declare as follows:

1. My name is Edward S. Bott Jr. I understand the nature of this oath, and I am otherwise competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge and the facts stated herein are true and correct.

2. On October 15, 2019, I spoke with counsel for Kearney Towing & Repair Center, Inc. ("Kearney"). During our conversation, counsel informed me that Kearney is willing to enter into a Protective Order with Goodyear in the state court case that is identical to the Protective Order between Goodyear and Plaintiffs in the present case.

Pursuant to 28 U.S.C. SECTION 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 23rd day of October, 2019, in St. Louis, Missouri.



EDWARD S. BOTT, JR.